

# **[CAAG] COMMUNICATION AXESS**

September 9, 2015

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

*Electronic cc: Karen Peltz Strauss and Gregory Hlibok*

*Re: Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123; Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51*

Dear Ms. Dortch:

Hancock, Jahn, Lee & Puckett, LLC d/b/a Communication Axess Ability Group and branded Star VRS ("CAAG/Star") and Star VRS for the DeafBlind ("Star VRSdb") herein express serious concern that the Federal Communications Commission ("FCC/Commission") has not responded to the Video Relay Service ("VRS") Provider's Joint Proposal.<sup>1</sup> VRS providers experienced the full impact of the recent July 1, 2015 rate cut on September 4, 2015.

The impact these cuts now have has been made clear on the record.<sup>2</sup> Additionally all six VRS providers have acknowledged the substantial detriment the rate cuts will place on the newest and smallest VRS providers.<sup>3</sup>

ASL/Global recently filed public comment stating, "in the face of continuing reductions in compensation, no *action* has been taken to address how long providers such as ASL Services Holdings can continue providing service." CAAG/Star fully concurs with this statement. In a meeting with the Chairman's Office CAAG/Star expressed the detrimental effects this rate cut will have on its services including services particular to CAAG/Star for DeafBlind consumers.

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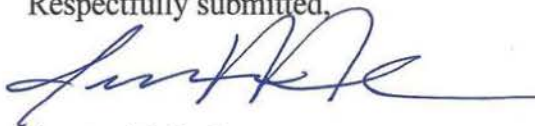
<sup>1</sup> JOINT PROPOSAL OF ALL SIX VRS PROVIDERS FOR IMPROVING FUNCTIONAL EQUIVALENCE AND STABILIZING RATES, CG Docket 10-51

<sup>2</sup> "...less customer care, lower pay for interpreters, slower technical upgrades, and less support for community projects." JOINT COMMENTS OF ALL SIX VRS PROVIDERS ON ROLKA LOUBE PAYMENT FORMULAS AND FUNDING REQUIREMENTS, CG Docket 10-51

<sup>3</sup> "...the most severely affected are the smallest three providers who are least positioned to sustain those cuts. Accordingly, given the reductions that have already occurred, even rate stabilization may not be enough to keep these smallest three providers in business." *United Providers ex parte*, April 30, 2015, CG Docket 10-51

CAAG/Star urges the Commission to take immediate action to stabilize rates for the VRS industry and *particularly* for the newest and smallest providers including CAAG/Star who are now at the greatest risk of ceasing services.<sup>4</sup>

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'J. M. Jack', with a long horizontal flourish extending to the right.

Jeremy M. Jack

Vice President, Star VRS

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<sup>4</sup> *United Providers ex parte*, April 30, 2015, CG Docket 10-51